

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*

Debtors.

Chapter 11 Case No.

Case No. 08-13555 (JMP)

(Jointly Administered)

**AFFIDAVIT OF JAMES PASTRANA IN SUPPORT OF
THE REPLY OF TRAXIS FUND LP AND TRAXIS EMERGING
MARKET OPPORTUNITIES FUND LP TO RESPONSE OF PLAN
ADMINISTRATOR TO MOTION OF TRAXIS FUND LP AND TRAXIS
EMERGING MARKET OPPORTUNITIES FUND LP TO COMPEL
DEBTORS TO REISSUE DISTRIBUTION CHECKS FOR ALLOWED CLAIMS**

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

JAMES PASTRANA, being duly sworn, deposes and says:

1. I have been employed by Seward & Kissel LLP, located at One Battery Park Plaza, New York, New York, 10004, since June of 1983. I have been the Mail Services and Duplicating Manager since August of 1992.

2. I am over the age of eighteen years and am not a party to the above-captioned proceedings. I have personal knowledge of the facts stated in this Affidavit and am competent to testify to them.

3. I make this declaration in support of the Reply of Traxis Fund LP and Traxis Emerging Market Opportunities Fund LP to Response of Plan Administrator to Motion of Traxis Fund LP and Traxis Emerging Market Opportunities Fund LP to Compel Debtors to Reissue Distribution Checks for Allowed Claims (the "Reply").

4. As Mail Services and Duplicating Manager, I oversee the operations and employees in the Mail Services and Duplicating department of Seward & Kissel and its employees.

5. Seward & Kissel's handling of incoming mail follows a very specific, routine and consistently implemented set of procedures.

6. Mail addressed to Seward & Kissel's New York office is picked up at the relevant U.S. post office every morning by Speedy Dumor Mail and Delivery Service, a private courier, and is brought to Seward & Kissel's Mail Services and Duplicating department for sorting.

7. Seward & Kissel's Mail Services and Duplicating staff promptly sorts all incoming mail, and all mail addressed to an individual attorney, secretary or other staff member is hand-delivered to the physical inbox belonging to that employee.

8. If the intended recipient of incoming mail is unclear, I circulate a firm-wide e-mail notifying all employees in the New York office of the receipt of such mail. Seward & Kissel employees review these e-mails and notify me if they are, or know, the intended recipient of such mail.

9. Interoffice mail between Seward & Kissel employees is picked up by Mail Services and Duplicating personnel from individual physical outboxes, is then brought to the mailroom for sorting and is hand-delivered to the relevant recipients in the same fashion as mail delivered from outside the firm.

10. Mail Services and Duplicating personnel make several "rounds" of each floor in Seward & Kissel's New York office every hour during normal business hours for the purposes of picking up and delivering mail.

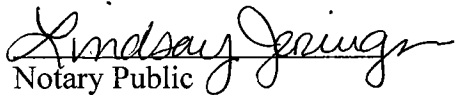
11. Incoming mail is never discarded by the Mail Services and Duplicating personnel, regardless of whether an intended recipient can be readily identified.

12. To the best of my knowledge, Seward & Kissel has never experienced any issues or difficulties with respect to the firm's ability to receive incoming mail and/or direct such mail to the appropriate recipient.

13. To the best of my knowledge, Seward & Kissel has never experienced instances of lost, stolen or misplaced mail.

14. At all relevant times, including during July of 2012, the procedures outlined above were followed exactly by me and the Mail Services and Duplicating staff.

Sworn to before me this
11th day of January, 2013


Notary Public

LINDSAY MARIE JERNIGAN
Notary Public, State of New York
No. 02JE6251987
Qualified in New York County
Commission Expires November 28, 2015

/s/ 
JAMES PASTRANA